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Georgia-Pacific Corporation

FILED
DISTRICT COURT OF GUAM

OCT 20 2005

MARY L.M. MORAN
CLERK OF COURT

IN THE DISTRICT COURT OF GUAM

CESS NAVARRRO OLMO and RONNIE
PASCUAL FERRERAS,

Plaintiffs,

vs.

A.P. GREEN INDUSTRIES, INC., A.P.
GREEN SERVICES, INC., A.W.
CHESTERTON COMPANY, AMCHEM
PRODUCTS, INC., ARMSTRONG WORLD
INDUSTRIES, INC., ASBESTOS CLAIMS
MANAGEMENT CORPORATION,
BABCOCK & WILCOX COMPANY,
COMBUSTION ENGINEERING, INC., DOW
CHEMICAL COMPANY, DRESSER
INDUSTRIES, INC., FELITALIC, INC.,
FLINTKOTE COMPANY, FOSTER
WHEELER CORP., GAF CORPORATION,
GARLOCK, INC., GEORGIA-PACIFIC
CORPORATION, HARBISON-WALKER
REFRACTORIES CO., HONEYWELL
INTERNATIONAL, INC., JOHN CRANE,
INC., KAISER GYPSUM COMPANY, INC.,
METROPOLITAN LIFE INSURANCE
COMPANY, OWENS CORNING, OWENS-
ILLINOIS, INC., PITTSBURG CORNING
CORPORATION, QUIGLEY COMPANY,
INC., UNITED STATES GYPSUM
COMPANY, and VIACOM, INC.,

Defendants.

CIVIL CASE NO. CV05-00025

**DEFENDANT GEORGIA-PACIFIC
CORPORATION'S MOTION TO
DISMISS PLAINTIFFS' FIRST
AMENDED COMPLAINT;
DECLARATION OF SERVICE**

DEFENDANT GEORGIA-PACIFIC CORPORATION'S
MOTION TO DISMISS COMPLAINT

Defendant Georgia-Pacific ("G-P") moves the Court for dismissal of the Complaint for lack of jurisdiction over the person of G-P pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure and for improper venue pursuant to Rule 12(b)(3) of the Federal Rules of Civil Procedure.

This motion is supported by the Memorandum of Points and Authorities filed with this Motion, the Plaintiffs First Amended Complaint (the "Complaint") filed in this action and the Affidavit of Emily K. Breslin.

Defendant requests that this motion be set for an oral argument at the convenience of the Court.

DATED: Hagåtña, Guam, October 20, 2005.

CARLSMITH BALL LLP



J.PATRICK MASON
Attorneys for Defendant
Georgia-Pacific Corporation

DECLARATION OF SERVICE

I, J.PATRICK MASON, hereby declare and state:

1. I am a United States citizen over the age of 18 years;
2. I am an Attorney of the law firm of Carlsmith Ball LLP.
3. On October 20, 2005, I caused to be served a filed copy of DEFENDANT

GEORGIA-PACIFIC CORPORATION'S MOTION TO DISMISS PLAINTIFFS' FIRST AMENDED COMPLAINT by hand delivery to the following:

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4. On October 20, 2005, I will also cause a copy of said documents to be served on the following by depositing same with the United States mail in sealed envelopes, postage prepaid, addressed as follows:

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Flintkote Company
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Harbison-Walker Refractories Co.
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DATED: Hagåtña, Guam, October 20, 2005.

A handwritten signature in black ink, appearing to read "J. Patrick Mason", written over a horizontal line.

J.PATRICK MASON